

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LABORATORIES MIRET, S.A. and VEDEQSA, INC., :

08 CV 4476

Plaintiffs,

Hon. P. Kevin Castel

-against-

A&B INGREDIENTS, INC.

MOTION TO ADMIT  
COUNSEL PRO HAC VICE

Defendant.  
-----X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Adam M. Cohen, Esq., a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

Jay R. Campbell, Esq.  
Renner, Otto, Boisselle & Sklar, LLP  
1621 Euclid Avenue, Nineteenth Floor  
Cleveland, Ohio 44115  
Phone Number: (216) 621-1113  
Fax Number: (216) 621-6165

To my knowledge, Jay R. Campbell, Esq. is a member in good standing of the Bar of the State of Ohio. To my knowledge, there are no pending disciplinary proceedings against Jay R. Campbell, Esq. in any State or Federal court.

Dated: New York, New York  
June 13, 2008

Respectfully submitted,

KANE KESSLER, P.C.

By: 

Adam M. Cohen (AMC-9918)  
1350 Avenue of the Americas  
New York, New York 10019  
(212) 541-6222  
(212) 245-3009 fax

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
<b>LABORATORIES MIRET, S.A. and VEDEQSA, INC., :</b>	<b>08 CV 4476</b>
<b>Plaintiffs, :</b>	<b>Hon. P. Kevin Castel</b>
<b>-against- :</b>	<b>AFFIDAVIT OF</b>
<b>A&amp;B INGREDIENTS, INC. :</b>	<b>ADAM M. COHEN, ESQ.</b>
<b>Defendant. :</b>	<b>IN SUPPORT OF MOTION</b>
<b>-----X</b>	<b>TO ADMIT COUNSEL</b>
	<b><u>PRO HAC VICE</u></b>

**STATE OF NEW YORK )**  
**) ss.:**  
**COUNTY OF NEW YORK)**

**ADAM M. COHEN, ESQ.,** being duly sworn, hereby deposes and says as follows:

1. I am a member of Kane Kessler, P.C., local counsel for Plaintiffs in the above-entitled action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Jay R. Campbell, Esq. as counsel *pro hac vice* to represent Plaintiffs' in this matter.
2. I have been a member in good standing of the Bar of the State of New York since 1989 and was admitted to practice law in 1989. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Jay R. Campbell for approximately five years.
4. Mr. Campbell is a partner at the law firm of Renner, Otto, Boisselle and Sklar, LLP in Cleveland, Ohio.
5. I have found Mr. Campbell to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. A current certificate attesting to Mr. Campbell's good standing with the Ohio Bar is annexed as part of Exhibit 'A' hereto.

7. Accordingly, I am pleased to move the admission of Jay R. Campbell, *pro hac vice*.

8. I respectfully submit a proposed order granting the admission of Jay R. Campbell, *pro hac vice*, which is attached hereto as Exhibit 'B'.

**WHEREFORE**, it is respectfully requested that the motion to admit Jay R. Campbell, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

Dated: New York, New York  
June 13, 2008

Respectfully submitted,

**KANE KESSLER, P.C.**

By: 

Adam M. Cohen (AMC-9918)  
1350 Avenue of the Americas  
New York, New York 10019  
(212) 541-6222  
(212) 245-3009 fax



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
LABORATORIES MIRET, S.A.	:
	:
and	:
	:
VEDEQSA, INC.	:
	:
Plaintiffs,	:
	:
v.	:
	:
A&B INGREDIENTS, INC.	:
	:
Defendant.	:
-----X	

Civil No. 1:08-cv-04476-PKC

JUDGE CASTEL

DECLARATION OF JAY R. CAMPBELL  
IN SUPPORT OF MOTION FOR  
ADMISSION *PRO HAC VICE*

Jay R. Campbell hereby makes the following declaration pursuant to 28 U.S.C. Section 1746:

1. I am a Partner of the law firm of Renner, Otto, Boisselle & Sklar, LLP, counsel for plaintiffs Laboratories Miret, S.A. and Vedeqsa, Inc. (collectively, the "Plaintiffs") in the above-captioned action, and I respectfully make this declaration in support of my application for admission to this Court *pro hac vice*.
2. I am a member in good standing of the Supreme Court of Ohio, the United States District Court for the Northern District of Ohio, the United States District Court for the Southern District of Ohio, the United States District Court for the District of Colorado, the United States Court of Appeals for the Federal Circuit, and the Court of Federal Claims. Pursuant to Local Rule 1.3 (c) of this Court, I hereby affirm that I am not a member of any other courts. Attached hereto is a Certificate of Good Standing issued by the Supreme Court of Ohio within the last thirty days.

# The Supreme Court of Ohio

## C E R T I F I C A T E

I, SUSAN B. CHRISTOFF, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Office of Attorney Services of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

Jay Reed Campbell

was admitted to the practice of law in Ohio on May 08, 1989; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 5th day of June, 2008.

SUSAN B. CHRISTOFF

*Director, Attorney Services Division*

  
Jui Moore  
*Attorney Registration Specialist*



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
LABORATORIES MIRET, S.A. and VEDEQSA, INC., :	08 CV 4476
:	
Plaintiffs, :	Hon. P. Kevin Castel
:	
-against- :	
:	ORDER FOR ADMISSION
A&B INGREDIENTS, INC., :	PRO HAC VICE
:	<u>ON WRITTEN MOTION</u>
:	
Defendant. :	
-----X	

Upon the motion of Adam C. Cohen, Esq., attorney for Laboratories Miret, S. A. and Vedeqsa, Inc., and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Jay R. Campbell, Esq.  
Renner, Otto, Boisselle & Sklar, LLP  
1621 Euclid Avenue, Nineteenth Floor  
Cleveland, Ohio 44115  
Phone Number: (216) 621-1113  
Fax Number: (216) 621-6165

is admitted to practice, *pro hac vice* as counsel for Laboratories Miret, S. A. and Vedeqsa, Inc., in the above captioned action, in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov) Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: New York, New York  
June 13, 2008

\_\_\_\_\_  
United States District/Magistrate Judge



**AFFIDAVIT OF SERVICE**  
*VIA REGULAR MAIL*

STATE OF NEW YORK     )  
  ) ss.:  
COUNTY OF NEW YORK    )

I, **NELLYA DYM**, being duly sworn, say:

I am not a party to the within action, am over 18 years of age, and reside in Brooklyn, New York.

On June 13, 2008, I served the following documents:


**MOTION TO ADMIT COUNSEL PRO HAC VICE**

by ***Regular Mail*** delivering a true copy thereof, enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to each of the following:

A&B Ingredients, Inc.  
24 Spielman Road  
Fairfield, New Jersey 07004

  
\_\_\_\_\_  
**NELLYA DYM**

Sworn to before me this  
13<sup>th</sup> day of June, 2008

  
\_\_\_\_\_  
Notary Public

SUSAN KAPLAN  
Notary Public, State of New York  
No. 01KA5008179  
Qualified in Kings County  
Commission Expires February 15, 20 11